

**TANNER & ORTEGA, L.L.P.**

ATTORNEYS AT LAW  
WWW.TANNERORTEGA.COM

HOWARD E. TANNER\*  
HUGO G. ORTEGA

\*MEMBER OF N.Y., N.J. AND D.C. BAR

**NEW YORK CITY OFFICE**

299 BROADWAY  
SUITE 1700  
NEW YORK, NY 10007  
OFFICE: (212) 962-1333  
FAX: (212) 962-1778

**WHITE PLAINS OFFICE**

175 MAIN STREET  
SUITE 800  
WHITE PLAINS, NY 10601  
OFFICE: (914) 358-5998  
FAX: (914) 761-0995

November 23, 2020

Honorable Paul E. Davison  
United States Magistrate Judge  
United States District Courthouse  
300 Quarropas Street  
White Plains, NY 10601

BY ECF and EMAIL/PDF

Re: *USA v. Shawn Johnson*, 20 MAG 8306  
Motion to Vacate All Bond Conditions

Dear Judge Davison:

I was appointed by the Court to represent Mr. Johnson in the above matter pursuant to CJA. On August 11, 2020 the defendant appeared on video for presentment. A bond hearing was conducted immediately thereafter at which time the Court granted the defendant's release on conditions including a \$100,000 bond secured by \$5000 cash by five financially responsible persons, home incarceration enforced by electronic monitoring, restriction of travel and other conditions (ECF Doc No. 4) On November 13, 2020, on consent, the Honorable Robert E. Krause ordered that home incarceration, be replaced with a curfew and continued electronic monitoring (ECF Doc No. 15).

I was informed today by the Government that they will not prosecute the defendant further in this case and that they will dismiss the Complaint (ECF Doc No. 2). I therefore write to the Court to request that all above conditions of the defendant's pretrial release be vacated immediately upon the Court's endorsement of this application; with exoneration of the cash bond to the sureties and removal of the electronic monitoring device as soon as possible.

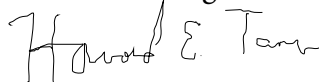
I have spoken with AUSA Derek Wikstrom who informs me that the Government consents to this application.

Very truly yours,

Bail conditions vacated; bail to be exonerated.

Tanner & Ortega, L.L.P.

SO ORDERED 11/23/20

 I.



Howard E. Tanner

cc: AUSA Derek Wikstrom (By email/PDF)  
PTSOAndrew Abbott (By Email/PDF)